

1 WILLIAM VERICK (State Bar No. 140972)
2 Klamath Environmental Law Center
3 P.O. Box 1128
4 Arcata, CA 95518
(707) 630-5061
wverick@igc.org

5 DAVID WILLIAMS (State Bar No. 144479)
6 Law Offices of David Williams
7 1839 Ygnacio Valley Road, Suite 351
Walnut Creek, CA 94598
(510) 847-2356
8 dhwill7@gmail.com

9 BRIAN ACREE (State Bar No. 202505)
10 Law Office of Brian Acree
11 95 3rd Street, Second Floor
San Francisco, CA 94103-3103
12 (510) 517-5196
brian@brianacree.com

13 WILLIAM N. CARLON (State Bar No. 305739)
14 Law Office of William Carlon
15 437 Post Street
Napa, CA 94559
16 (530) 514-4115
william@carlonlaw.com

17 Attorneys for Plaintiff
18 CALIFORNIANS FOR
19 ALTERNATIVES TO TOXICS

20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**

22 CALIFORNIANS FOR ALTERNATIVES TO Case No.: 3:24-cv-06632-SI
23 TOXICS,

24 Plaintiff,

DECLARATION OF WILLIAM N.
CARLON

25 v.

26 TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,

Honorable Susan Illston

27 Defendants.

28 I, William N. Carlon, declare as follows:

1 1. I make this declaration based upon personal knowledge, except as to those
2 matters which are stated otherwise. If called, I could, and would, competently testify as
3 follows:

4 2. I am an attorney licensed to practice in California, admitted to practice before
5 this court, and one of the attorneys of record in this action. I submit this declaration in support
6 of Plaintiff's Opposition to Defendants' Motion to Dismiss.

7 3. The discovery process has been slow to get started in this case.

8 4. The parties conducted their initial Rule 26(f) conference on January 22, 2025.

9 5. The parties explored settlement options for several months, but reached no
10 agreement.

11 6. On May 27, 2025, Plaintiff propounded its first set of written discovery,
12 including requests for admission, requests for production of documents, interrogatories, a
13 notice of deposition of Defendant Travis Moreda, and an inspection request.

14 7. Defendants sought, and obtained, an extension to respond to the first set of
15 discovery. (ECF No. 29.)

16 8. In order to continue exploring the possibility of settlement, the parties agreed to
17 a stay of the case until September 22, 2025, and the Court ordered the stay, further pushing out
18 Defendants' discovery responses. (ECF No. 31.)

19 9. On September 17, 2025, Defendants sought yet another 60-day extension to
20 respond to the May 27th discovery, and Plaintiff agreed.

21 10. Defendants' responses to discovery are now due November 21, 2025.

22 11. Plaintiff provided Defendants with documents bates stamped PLF000001
23 through PLF000124, including videos and photographs, that support the allegations made in
24 the complaint.

25 12. Plaintiff will supplement its disclosures as required by the Federal Rules of
26 Civil Procedure.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is
2 true and correct and that this declaration was executed in Napa, California on October 10,
3 2025.

4 By: /s/ William N. Carlon _____
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6 William N. Carlon
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